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Attorneys for Defendant Google LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF JONATHAN TSE IN
SUPPORT OF JOINT STIPULATION AND
[PROPOSED] ORDER EXTENDING
TIME TO EXTEND TIME FOR GOOGLE
TO FILE ITS MOTION FOR
PROTECTIVE ORDER AGAINST NON-
PARTY SUBPOENAS**

Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action.
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 6-2, I submit this declaration in support of the Joint
7 Stipulation and [Proposed] Order Extending Time For Google To Submit Declaration In Support of
8 Plaintiffs’ Motion to Seal (Dkt. 291) (“Stipulation”).

9 3. In September and October 2021, Plaintiffs served non-party subpoenas dated
10 September 14, 2021 on Ernst & Young LLC (“E&Y”), PricewaterhouseCoopers (“PwC”), and
11 Promontory Financial Group (“Promontory”).

12 4. Plaintiffs set a date of compliance on all three non-party subpoenas for October 22,
13 2021.

14 5. E&Y and PwC served their objections and responses to Plaintiffs’ non-party
15 subpoena on September 29, 2021, and October 20, 2021, respectively.

16 6. Promontory has not served its objections and responses to Plaintiffs’ non-party
17 subpoena.

18 7. The Parties agree that an extension of time of 6 days will provide the parties with
19 sufficient time to meet and confer to resolve or narrow disputes and to submit a 5-page, double-
20 spaced joint letter brief on any remaining disputes

21 8. The Court has previously modified the case schedule by extending Plaintiffs’
22 deadline to file a brief response to the affidavit and declaration submitted in response to the Court’s
23 request (Dkt. 110) and the deadline special master submissions (Dkt. 206) and also granted parties’
24 stipulation to extend time to answer the complaint (Dkt. 42), to submit protective order and ESI
25 order (Dkt. 72), to extend time for submitting motion to dismiss briefing (Dkt. 73), to submit
26 proposed redactions to the April 27, 2021 hearing transcript (Dkt. 163) and June 2, 2021 hearing
27 transcript (Dkt. 246), to set a briefing schedule for Google’s motion to dismiss counts six and seven
28

1 of the Second Amended Complaint (Dkt. 175), and to continue discovery deadlines (Dkt. 261), and
2 to extend time for Google to submit declaration in support of Plaintiffs' motion to seal (Dkt. 294).

3 9. The 6-day extension will not affect the schedule in this case.
4

5 I declare under penalty of perjury of the laws of the United States that the foregoing is true
6 and correct. Executed in San Francisco, California on October 20, 2021.
7

8 DATED: October 20, 2021

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

9 By /s/ Jonathan Tse
10 Jonathan Tse

11 *Attorney for Defendant*
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